

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X

WILLOW FRIEDLAND, STEVEN GONZALEZ,
and MIRIAM SIERADZKI,

Plaintiffs,

-against-

NOTICE OF MOTION

24-CV-07064 (DLC)

CITY OF NEW YORK, FORMER MAYOR BILL
DE BLASIO; FORMER NEW YORK CITY POLICE
DEPARTMENT COMMISSIONER DERMOT
SHEA; and FORMER NEW YORK CITY POLICE
DEPARTMENT CHIEF OF DEPARTMENT
TERENCE MONAHAN,

Defendants.

----- X

PLEASE TAKE NOTICE that defendants City of New York (“the City”), Former Mayor Bill De Blasio, Former New York City Police Department Commissioner Dermot Shea, and Former New York City Police Department Chief of Department Terence Monahan (hereinafter “defendants”), upon the Declaration of Senior Counsel Yini Zhang, dated April 25, 2025, and the exhibits attached thereto; the accompanying Memorandum of Law, dated April 25, 2025, and upon all prior pleadings and proceedings had herein, will move this Court before the Honorable Denise L. Cote, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, at a date and time to be determined by the Court, for an Order, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, of dismissal with prejudice, together with such other relief as the Court deems just and proper on the grounds that plaintiffs have failed to state a claim against defendants upon which relief can be granted.

PLEASE TAKE FURTHER NOTICE that plaintiffs' opposition, if any, shall be filed by May 16, 2025; and

PLEASE TAKE FURTHER NOTICE that defendants' reply, if any, shall be filed by May 30, 2025.

Dated: New York, New York
April 25, 2025

MURIEL GOODE-TRUFANT
Corporation Counsel of the City of New York
Attorney for Defendants
100 Church Street, Room 3-178
New York, NY 10007
T: (212) 356-3541
E: yinzhan@law.nyc.gov

By: s/ *Yini Zhang*
Yini Zhang
Senior Counsel
Special Federal Litigation Division

cc: Via ECF
Counsels of Record